



July 27, 2004

Federal Communications Commission  
Washington, D.C. 20554

**RE: Comments In Response to MB Docket No. 04-207 on A La Carte and Themed Programming and Pricing Options for Programming Distribution On Cable Television and Direct Broadcast Satellite Systems**

As an organization that is strongly committed to equality for women, the National Partnership for Women & Families (“National Partnership”) submits these comments in MB Docket No. 04-207 to express our concerns about cable a la carte. The National Partnership is a non-profit, nonpartisan organization that uses public education and advocacy to promote fairness and equal opportunity in the workplace and in all areas of society. Media, especially cable television, plays a significant role in American society and has the potential to promote positive images of women and to impact various aspect of women’s lives. It is, therefore, extremely important that cable television reflect the diverse experiences and viewpoints of all Americans. We have recently become aware of legislation that would force cable and satellite operators to sell each channel they offer individually through an “a la carte” model. We are concerned about the effects that cable a la carte could have on smaller cable channels that target particular interests or demographics, such as women, people of color, lesbians and gays, non-English and limited English proficient speakers, and other minority groups. The National Partnership asks the Federal Communications Commission (“FCC”) to carefully consider the implications of cable a la carte and how it may affect diversity in cable television, media ownership, employment, and programming.

Like most other networks, the business model of smaller networks targeting women and minority groups (“niche networks”) requires that their service be available in the largest possible number of television homes. According to the record in this proceeding, under the a la carte proposal, such networks may have an even more difficult time getting distribution on cable.<sup>1</sup> Without the largest possible viewership, smaller stations would receive less advertising revenue, their marketing costs would skyrocket, the fees charged to cable and satellite operators would increase, and such stations would be limited in their ability to produce quality entertainment. In addition, smaller channels might be forced to raise their prices, which would place an expensive burden on customers and discourage new customers from purchasing the smaller channels. By potentially limiting their viewership and jeopardizing their financial stability, the cable a la carte model could bring about the demise of niche networks that target female and minority audiences.

In addition, an a la carte model could prevent smaller, newer networks from building viewership, and thus threaten the growing diversity of cable television. Many smaller channels rely on “channel-surfers” who find the show or channel because it is part of a standard line-up. Few consumers would pay for a channel they have never seen before or heard of. An a la carte system could potentially lock out newer minority- and women-targeted channels in favor of incumbent channels that are owned by large media corporations. With fewer niche channels, there will be fewer opportunities for education and discussion of important issues affecting women and minority populations.

The National Partnership appreciates having the opportunity to submit these comments and urges the FCC to heed the concerns expressed by multicultural programmers and civil rights groups and refrain from changing the current system until it carefully examines the proposal’s impact on media diversity.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'D. Ness', with a long, sweeping horizontal line extending to the right.

Debra L. Ness  
President

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<sup>1</sup> See, e.g., Letter to the House Energy and Commerce Committee signed by the chief executives of BET Holdings, TV One, the International Channel, and Si TV.